

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARCUS HILLIARD,)	
)	
PLAINTIFF,)	
)	Case No. 20-cv-1144
v.)	
)	Judge Martha M. Pacold
NATIONAL BOARD OF MEDICAL)	
EXAMINERS and LOYOLA)	Magistrate Judge Gabriel A. Fuentes
UNIVERSITY OF CHICAGO,)	
)	
DEFENDANTS.)	

**JOINT MOTION FOR ADDITIONAL TIME TO COMPLETE
SCHEDULED DEPOSITIONS**

Plaintiff Marcus Hilliard (“Plaintiff”) and Defendant Loyola University of Chicago (“Loyola” or “Defendant,” together with Plaintiff, the “parties”), by their undersigned counsel, respectfully request an additional 10 days to complete depositions following the close of discovery on January 30, 2023. In support of this motion, the parties state as follows:

1. Since the start of discovery in July 2023, the parties have been committed to moving this case forward and originally aimed to complete discovery within three months. *See* Dkt. Nos. 63, 64 (setting October 14, 2022 as the deadline to complete fact discovery). As a result of the significant volume of documents, the need for third-party discovery, and confidentiality issues related to the production of student and medical files, however, discovery took longer than anticipated to complete and the parties moved to extend the fact discovery deadline – first to December 15, 2022 and then to January 30, 2023 as the parties awaited additional third-party document productions. *See* Dkt. Nos. 72, 73, 78, 79.

2. The parties are now poised to complete fact discovery on January 30, 2023, with the exception of four depositions for which the parties were unable to find dates prior to January

30, but which are currently scheduled for February 1, 3 and 8, respectively.¹ The parties respectfully request that the Court permit them an additional ten days to complete those depositions.

3. The parties do not seek to extend the fact discovery deadline in any other respect and their request does not affect the expert discovery deadlines set forth in the Court's most recent order. *See* Dkt. No. 79.

4. The parties bring this joint motion in good faith and to complete previously noticed depositions which could not take place earlier due to the witnesses' and counsel's other professional obligations.

WHEREFORE, the parties jointly and respectfully request that the Court grant this request and permit the parties an additional 10 days – through February 9, 2023 – to complete the remaining four depositions.

Dated: January 20, 2023

Respectfully Submitted,

MARCUS HILLIARD

LOYOLA UNIVERSITY OF CHICAGO

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¹ The depositions scheduled for February 1 and 3 will be taken of witnesses in both their individual capacity as well as in their capacity as corporate representatives pursuant to Fed. R. Civ. P. 30(b)(6).